



*Infrastructure, environment, buildings*

Mr. Michael Ribordy  
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Subject

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Time-Critical Removal Action – Former Plainwell Impoundment  
Monthly Report (February 2009)

Dear Mike:

Attached is the 24<sup>th</sup> monthly progress report for the Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Stephen Garbaciak Jr., P.E.  
Vice President

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SEDIMENTS

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March 16, 2009

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

**REPORT #24, FEBURARY 2009**

**PREPARED BY ARCADIS  
MARCH 16, 2009**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP**

**SUBMITTED TO**

**MICHAEL RIBORDY, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #24, FEBRUARY 2009**

**Significant Developments and Activities During the Period**

- On February 2, the Kalamazoo River Study Group (KRSRG) submitted a request to the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) to discontinue surface water monitoring activities because all field activities, with the exception of water control structure (WCS) removal, had been completed. Surface water monitoring activities included weekly surface water sampling and daily turbidity monitoring in accordance with Section 5 of the *TCRA Design Report*.
- On February 2, the KRSRG submitted copies of non-hazardous waste manifests, turbidity logs, and surface water sample chain-of-custodies to USEPA. These documents were normally collected by the onsite USEPA representative, however, a representative was not onsite at these times.
- On February 4, the USEPA approved the KRSRG request to discontinue surface water monitoring activities.
- On February 5, legal counsel for Millennium Holdings, LLC (MHLLC) notified USEPA that MHLLC was stopping work under the AOC.
- On February 10, the KRSRG submitted copies of analytical data for surface water samples TS30128 through TS30131 to USEPA.
- On February 16, the KRSRG submitted the 23<sup>rd</sup> *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for January 2009 to USEPA.
- In February, USEPA issued a fact sheet titled *PCB Cleanup Progress, Updates, and Public Meeting*. The KRSRG received a copy of this fact sheet on February 20.
- On February 26, USEPA hosted a public open house regarding the Plainwell TCRA.

**Data Collected and Field Activities Conducted During the Period**

- Work activities were not conducted on February 1.
- During the weeks of February 2, 9, and 16, the KRSRG continued removal of the WCS.
- During the week of February 23, the KRSRG completed removal of the WCS.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #24, FEBRUARY 2009**

**Laboratory Data Received During the Period**

- No analytical data were received on February 1.
- During the week of February 2, the KRSG received analytical data for surface water samples TS30128 through TS30131 (collected in January).
- No analytical data were received during the weeks of February 9, 16, or 23.
- The KRSG is not awaiting analytical results.

**Issues Encountered and Actions Taken**

- During the week of February 2, five pairs of sheets from the WCS could not be fully removed using a vibratory or an impact hammer. Due to river velocity in the area and water elevation, divers could not safely access the sheets. A diversion structure was installed during the weeks of February 9 and 16 to deflect water away so that divers could safely access the remaining sheets. These sheets were cut off near the riverbed, and the upper sections of the sheets were removed. The location of the sheets remaining in the riverbed was recorded using a global positioning system (GPS) device.

**Developments Anticipated During the Next Reporting Period**

- No activities are scheduled in March.
- The KRSG will continue to submit copies of analytical data, if necessary, from TCRA sampling activities to USEPA in March.

**Kalamazoo River Study Group  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
Monthly Report #24, February 2009**

**Table A — Summary of Data Received in February 2009**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
<b>Surface Water Samples</b>									
TS30128 <sup>1</sup>	01/22/09	02/06/09	TCRA114_SDSP	TAL	Phase 2 Cofferdam downstream TML	PCBs	< 0.047 µg/L	No Action Limit	None
TS30129 <sup>1</sup>					Phase 2 Cofferdam upstream TML	PCBs	< 0.047 µg/L	No Action Limit	None
TS30130 <sup>1</sup>	01/29/09	02/06/09	TCRA114_SDSP	TAL	Phase 2 Cofferdam downstream TML	PCBs	< 0.047 µg/L	No Action Limit	None
TS30131 <sup>1</sup>					Phase 2 Cofferdam upstream TML	PCBs	< 0.047 µg/L	No Action Limit	None

**Notes:**

1 - Work boats were demobilized during December 2008. Surface water samples were collected from the shore line. Since the water in this area is shallow, the stainless steel bomb sampler (and associated rinse blank) was not needed.

\* Samples were collected in accordance with Section 5 of the TCRA Design Report.

\* Analytical results have not been validated.

PCBs - polychlorinated biphenyls

TAL - Test America Laboratory

TML - Turbidity Monitoring Location

µg/L - micrograms per liter